

2-Way Memo

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (Originator of message):

Use brief, informal language.

Conserve space.

Forward original and one copy.

RECEIVER (Replier to message):

Reply below the message, keep one copy, return one copy.

Subject:

RCRA Investigation at Talley Defense Systems, Mesa,

*Complete Report Filed**under this EPA ID# A20 020 132 502**A20 980 816 276**A20 981 425 010*

3A

From :

Philip Bobel, Chief
Waste Programs Branch

T-2

DATE OF MESSAGE

6/25/86

ROUTING SYMBOL

April 30 1986 T-3-2

SIGNATURE OF ORIGINATOR

Tamara Brode

TITLE OF ORIGINATOR

FOLD MESSAGE Environmental Engineer FOLD

Enclosed is a RCRA investigation report for Talley Defense Systems. I conducted this inspection as an overview of the new State Inspectors. The State provided me their inspection report and I am providing them mine, along with some critical remarks. Dale Anderson, the State Inspector, included the surface impoundment portion of the State's Checklist. He is interpreting Plant 3 as being storage in a surface impoundment (S04) as well as treatment other (T03) (open burning). I don't think that their operation at Plant 3 would meet the definition of a surface impoundment particularly in light of the fact that the wet waste (propellant) is not RCRA hazardous. It basically is hydrated ammonium perchlorate and does not meet the definition of the RCRA characteristics. When it dries, it becomes ignitable and is treated by burning. I explained the situation to Bob Kayser at EPA-HQ (FTS 382-4536). After he spoke with others at EPA-HQ, he phoned back to say that the burn pit did not meet the definition of an impoundment.

To :

thru: Tamara Brode T-3-2
Kathleen Shimmin, Chief
Field Operations Branch T-3

2. RETURNED TO ORIGINATOR

5027-107

DATE OF REPLY

ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER